

FROM: Rich Fisher, GM
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I am the general manager of KWGS-FM, a 50kw non-commercial public radio station in Tulsa, OK. Our licensee is also about to commence broadcasting on a new station, KWTU, currently a 5kw CP station. On behalf of my station(s), I urge the Commission to adopt and authorize the Supplemental Audio Channel (SAC) capability within HD Radio. While HD Radio's improved sound quality and elimination of distorting interference are important factors in our adopting this new technology for KWTU, a decisive factor in converting KWGS will be the capability to multiplex KWGS through a SAC. I believe the use of supplemental audio is integral to our public service mission and will enable us to expand programming to meet listener needs that are completely unserved in the Tulsa market.

KWGS/KWTU has already identified those unserved audiences in the Tulsa area. For example, in 1995, our licensee embarked on acquiring an additional frequency because the commercial classical music formatted station in Tulsa was sold, and subsequently switched format. For nine years as we awaited a decision to award the frequency, there was no classical music on radio in Tulsa. Now, after spending hundreds of thousands of dollars, we will sign-on a classical music station this summer.

Yet, there are many other unserved audiences that public broadcasting is uniquely positioned to serve with multiplexed programming services. SAC offers the opportunity to serve those unserved audience with varied and diverse programming formats or streams in a very cost-effective way. KWGS/KWTU have identified a jazz formatted service, an American Indian and/or Hispanic news and information service, and a "college radio"/alternative rock music service as potential program streams which could greatly enhance our public service mission.

In addition, the SAC capability offers tremendous cost effectiveness and enormous efficiencies compared to the difficulty, cost, and length of time associated with acquiring additional frequencies. Imagine if we would have had this technology nine years ago, KWGS could have quickly put in a multiplexed signal, filling a radio gap that community leaders, other media outlets, and arts leaders have all recognized as a community deficiency. In fact, many of those community leaders have stated that they consider the lack of a full-time classical music station as a critical factor in the Tulsa's loss of a full-time symphony orchestra.

While the emergence of KWTU will address that community need, there are many other unserved or underserved audiences which would benefit from more public broadcasting entities. The potential use of SAC technology coupled with public radio's proven track record in serving the public's educational needs, offers the

Commission a golden opportunity to extend our joint mission, "to broadcast in the public interest" to many new audiences.

Thank you for offering public comments on this tremendous opportunity to enhance broadcasting in America.

Sincerely,

Rich Fisher
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